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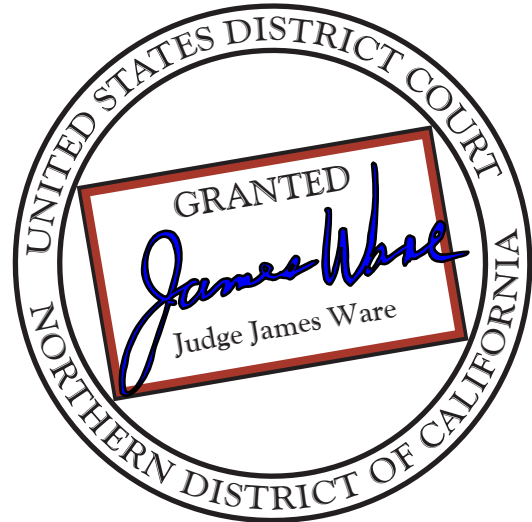
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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CRYPTOGRAPHY RESEARCH, INC.,

Plaintiff

v.

VISA INTERNATIONAL SERVICE  
ASSOCIATION,

Defendant.

Case No. C 04-CV-04143 JW (HRL)

**STIPULATION AND ~~[PROPOSED]~~  
ORDER WITHDRAWING MOTION TO  
BIFURCATE ISSUES OF LIABILITY AND  
WILLFULNESS AND DAMAGES AND  
FOR STAY OF DISCOVERY**

**STIPULATION**

WHEREAS:

On May 22, 2006, Defendant Visa International Service Association ("Visa International") filed a Motion to Bifurcate Issues of Liability and Willfulness and Damages and for Stay of Discovery, and;

On June 16, 2006, counsel for the parties met and conferred informally to resolve a number of discovery issues related to Plaintiff Cryptography Research, Inc.'s ("CRI") Motion to Compel Visa to Make Individuals Available for Deposition, Produce Documents, and Answer Interrogatories and agreed that Visa International will withdraw its Motion to Bifurcate Issues of Liability and Willfulness and Damages and for Stay of Discovery. Because Visa International has agreed to produce CRI's requested damages discovery, its request for the stay of discovery related to damages is moot. Insofar as the motion sought bifurcation of liability from damages or willfulness at trial, Visa International withdraws that portion of its motion without prejudice to its right to refile prior to trial.

Accordingly, IT IS HEREBY STIPULATED by and between Visa International and CRI, through their respective counsel of record, as follows:

Visa International hereby withdraws its Motion to Bifurcate Issues of Liability and Willfulness and Damages and for Stay of Discovery, AND THE June 26, 2006 hearing on the motion shall be taken off calendar.

Dated: June 21, 2006

QUINN EMANUEL URQUHART  
OLIVER & HEDGES, LLP

By: /s/ David Eiseman  
David Eiseman

Attorneys for Defendant  
VISA International Service Association

1 Dated: June 21, 2006

FENWICK & WEST LLP

2 By: /s/ Jedediah Wakefield  
Jedediah Wakefield

3  
4 Attorneys for Plaintiff Cryptography Research,  
Inc.

5 **ATTESTATION OF E-FILED SIGNATURE**

6 I, David Eiseman, attest that signatory Jedediah Wakefield has read and approved the  
7 STIPULATION AND [PROPOSED] ORDER WITHDRAWING MOTION TO BIFURCATE  
8 ISSUES OF LIABILITY AND WILLFULNESS AND DAMAGES AND FOR STAY OF  
9 DISCOVERY and consents to its filing in this action.

10 /s/ David Eiseman  
11 David Eiseman

12  
13  
14 **ORDER**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16  
17 DATED: June 21, 2006

18   
The Honorable James Ware  
United States District Judge